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January 27, 1999

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
Office of the Secretary  
1919 M Street, N.W.  
Room 222  
Washington, DC 20554

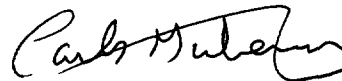
**Re: Reply Comments of AT&T Corp. on the Report and Recommendations of  
the Abbreviated Dialing Ad Hoc Working Group to the North American  
Numbering Council Report Regarding Abbreviated Dialing Arrangements,  
CC Docket No. 92-105**

Dear Ms. Salas:

Enclosed please find an original and four (4) copies of the reply comments of AT&T Corp. filed today with the Commission in the above-referenced proceeding. In addition, two copies have been filed with Jeannie Grimes of the Common Carrier Bureau and an additional copy has been filed with ITS. Also enclosed is a copy of AT&T Corp.'s comments on a 3.5 inch diskette in WordPerfect 5.1 format.

If you have any questions, please contact the undersigned.

Respectfully submitted,



Carlos A. Gutierrez

Enclosure

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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JAN 27 1999

U.S. DEPARTMENT OF COMMERCE  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Report and Recommendations of the	)	
Abbreviated Dialing Ad Hoc Working Group	)	CC Docket No. 92-105
to the North American Numbering Council	)	
Regarding Abbreviated Dialing Arrangements	)	
	)	

**REPLY COMMENTS OF AT&T CORP.**

AT&T Corp. ("AT&T") hereby submits its reply comments in response to the Common Carrier Bureau's Public Notice on the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council Regarding Abbreviated Dialing Arrangements.<sup>1/</sup>

The vast majority of the commenters in this proceeding support the conclusion of the North American Numbering Council Report ("NANC Report") that there is no current need to establish additional nationally administered abbreviated dialing arrangements ("ADAs"). The possible applications for ADAs are speculative at this point, making it impossible to assess thoroughly the technical and economic feasibility of such a system. Furthermore, creation of a national ADA system would conflict with long-established local and regional ADAs. The few comments advocating new national ADAs contain no new information and they in no way negate any of the Working Group's conclusions.

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<sup>1/</sup> Public Notice, Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Abbreviated Dialing Arrangements, CC Docket No. 92-105 (rel. Dec. 14, 1998).

AT&T takes strong exception to the gratuitous and unfounded suggestion of some commenters that the Working Group's processes in promulgating the NANC Report were somehow deficient. MCI's accusations, for example, that "little if any vendor/supplier participation was sought by the Working Group" and that "vendor/supplier opinions were half-heartedly solicited toward the end of the Working Group's efforts" are entirely inaccurate.<sup>2/</sup> The Working Group sent out letters encouraging specific vendors and manufacturers to participate and, as a result, vendors submitted written responses and attended Working Group meetings to respond to questions and clarify their written responses. This input was integral to the estimated implementation timelines included in the NANC Report. The ultimate usefulness of the participation by vendors, however, was limited by the vagueness of the proposals set forth by those parties favoring a national ADA arrangement. Vendors and manufacturers could not be expected to develop switch software or applications for such highly speculative and indefinite ADA plans in the absence of definitive service descriptions, switch requirements or application standards.

Nor is there any merit to MCI's charges that the Working Group was "ILEC- and wireless-dominated" and that the Report is "a thinly-veiled effort to preserve the numbering status quo to the exclusive advantage of monopoly providers."<sup>3/</sup> From the outset, Working Group meetings were advertised and open to any interested party. The proportion of Working Group participants from the different industry segments plainly was a direct reflection of their interest (or lack of interest) in the deployment of additional nationally administered ADAs.

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<sup>2/</sup> In the Matter of the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group of the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements, Comments of MCI WorldCom, Inc. at 5-6, CC Docket No. 92-105 (filed (continued on next page))

Implying that the Working Group somehow “stacked the deck” in favor of ILECs and wireless carriers simply because of a demonstrated lack of interest by other industry segments faults the Working Group for something over which it has no control.

Moreover, based on the comments submitted in this proceeding, it does not appear that those industry segments that MCI claims were somehow shut out of the process share MCI’s concern. The majority of the comments filed support the NANC Report’s conclusions.<sup>4/</sup> Even more telling, is the absence of comments in support of MCI by representatives of those industry segments that MCI claims were ignored in the NANC Report. Most CLECs and ISPs chose not to participate in the Working Group and thus far have chosen not to comment on the NANC Report. While MCI and Low Tech attempt to convince the Commission that the conclusions of the NANC discriminate against certain classes of carriers, it is not apparent that either of these parties actually represents the views of their respective industry segments. The Commission should give no credence to their unfounded attempts to impugn the hard work of all the Working Group participants.

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(continued from previous page)

Jan. 13, 1999) (“MCI Comments”).

<sup>3/</sup> MCI Comments at 1-2.

<sup>4/</sup> See Comments of Communications Venture Services, Inc. at 1; Comments of PrimeCo Personal Communications, L.P. at 1; Comments of the SBC Communications, Inc. at 1; Comments of the United States Telephone Association at 2; Comments of Bell Atlantic at 1; BellSouth Comments at 2; Comments of NENA, APCO, and NASNA at 2; and Comments of AT&T Corp. at 2.

## CONCLUSION

For the reasons set forth above and in its initial comments in this proceeding, AT&T respectfully requests that the Commission adopt the conclusions of the NANC Report and decline to establish a nationally administered abbreviated dialing regime at this time.

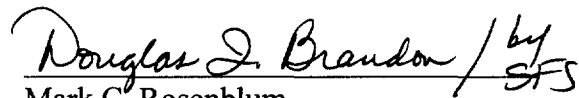
Respectfully submitted,

AT&T CORP.

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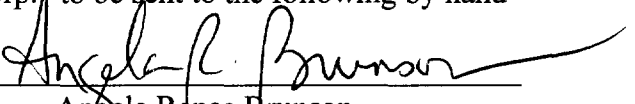
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## CERTIFICATE OF SERVICE

I, Angela Renee Brunson, hereby certify that on this 27th day of January, 1999, I caused copies of the foregoing "Reply Comments of AT&T Corp." to be sent to the following by hand delivery (\*) and first class mail.

  
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